

REMARKS/ARGUMENTS

Claims 16-30 are pending in the application identified above. The Examiner has rejected claims 16-30. Applicants respectfully traverse these rejections and request reconsideration and allowance in light of the foregoing amendments and following arguments. Applicants have also added claims 31-34 and submit that these claims are allowable over the cited references.

By this Amendment, Applicants have amended independent claims 16, 24, and 26. Applicants have also amended claims 20 and 30 to correct minor errors without affecting the substance of these claims. Applicants have also added claims 31-34.

Claim Rejections Under 35 U.S.C. § 103

In the Office Action (OA) mailed September 8, 2005, the Examiner rejected claims 16-30 as unpatentable over U.S. Patent 5,745,712 ("Turpin") in view of U.S. Patent Application No. 2002/0129006 ("Emmett") and in further view of U.S. Patent 6,389,434 ("Rivette"). None of these references, however, teaches "displaying the layout item as selected in one of the views other than the view in which the layout item was selected" as is recited in Applicants' amended independent claims 16, 24, and 26. Further, no motivation exists to combine the three references, contrary to the Examiner's assertion.

In a § 103(a) rejection, the Examiner must first establish a *prima facie* case of obviousness. MPEP § 2142. To do so, the Examiner must show that the prior art both teaches all elements of the claims and provides the reason or motivation to make the claimed combination. The mere fact that references can be combined does not create a *prima facie* case of obviousness. Moreover, the motivation to combine cannot come

from the applicant's own disclosure but must come from the prior art itself. Additionally, no motivation to combine references exists where doing so would render one of the prior art references unsatisfactory for its intended purpose.

I. The cited references together do not teach all of the elements of the claims

The combination of Turpin, Emmett, and Rivette does not teach all of the elements of the claims. For example, none of these references teaches "displaying the layout item as selected in one of the views other than the view in which the layout item was selected" as recited in Applicants' amended claims 16, 24, and 26.

Turpin does not teach or suggest "displaying the layout item as selected in one of the views other than the view in which the layout item was selected" (emphasis added). In the OA, the Examiner equated "displaying the layout item as selected in one of the views not selected" with the feature described in Turpin at col. 24, lines 59-61. OA page 3. However, in Turpin, the feature was selected in the same view as the one in which it is displayed. Turpin discloses a method by which:

The value tree is actually created as follows. A branch is first added by clicking the Branch object on the object bar. . .

[T]he value tree now shows a branch, but no condition or conclusion. A dotted rectangle surrounds the conclusion node, showing that it is selected.

As described in Turpin, the branch includes a conclusion node, which is displayed as selected in the Value Tree view. Turpin, however, does not teach or describe the user as having selected the conclusion node outside of the Value Tree View. Thus, Applicants submit that Turpin does not teach or suggest "displaying the layout item as

selected in one of the views other than the view in which the layout item was selected” (emphasis added).

Emmett also does not disclose or suggest this limitation. Emmett discloses a method or system that:

Transmits at least a portion of the reformatted content of the document identified by the request to the client in a format compatible with the browser for display at the display of the client.

Emmett, block 0035. Thus, Emmett teaches displaying one view that contains one portion of a document to the client. Consequently, Applicants submit that Emmett does not teach or suggest “displaying the layout item as selected in one of the views other than the view in which the layout item was selected.”

Finally, Rivette does not cure this defect. Rivette discloses a system with four views--the note view, the object centric view, the link view, and a user-defined view. Rivette, col. 17, lines 7-10. Rivette discloses a system in which, “[b]y utilizing multiple windows 4304, 4306, 4308, 4310, the user can simultaneously display different views of the same or different portions of the notes database.” Thus, in one embodiment, users can view different portions of the notes database in the different views. In the other embodiment, users can view the same portion of the notes database in the different views. But Rivette does not teach or suggest “displaying the layout item as *selected* in one of the views other than the view in which the layout item was selected” as do Applicants.

II. No motivation exists to combine the references as suggested by the Examiner

Applicants' amended claims 16, 24, and 26 recite a method, system, or computer program that includes "displaying simultaneously a logic view, a property view, and a layout view." The Examiner rejected these claims as obvious in light of Turpin in view of Emmett and in further view of Rivette. OA ¶ 7. Contrary to the Examiner's assertion, there is no motivation to combine the three references.

Combining the three references renders Emmett unsuitable for its intended purpose of reducing the download time necessary to transmit information to handheld devices that have limited bandwidth capabilities. Emmett, block 011. Specifically, Emmett teaches a method and system "for presenting content developed for display on large form factor devices (e.g. PC monitors) on small form factor screens of handheld devices," including Personal Digital Assistants (PDAs) and cellular phones. Emmett, blocks 0013-0014. To achieve this goal, Emmett only discloses transmitting information about one document or web page to the user, thus teaching away from transmitting multiple notes at the same time. Emmett block 0038. Further, displaying multiple notes as taught by Rivette, to be viewed simultaneously on a handheld device renders Emmett unsatisfactory for its intended purpose by increasing the download time necessary to transmit information to handheld devices that have limited bandwidth capabilities.

Combining the three references also renders Rivette unsuitable for its intended purpose of linking notes with data objects. Rivette, col. 3, line 67. Rivette teaches a note engine in which "the user can simultaneously display different views of the same or different portions of the notes database" by utilizing multiple windows. Rivette col. 17, lines 5-23. Rivette specifically states that the display used for the interface may be "a

conventional computer monitor or [a] display produced in a V[irtual] R[eality] environment.” Rivette, col. 29, lines 2-3. Simultaneously displaying multiple notes on the small form factor devices taught by Emmett would require the device to shrink each note to such a small size as to make the information contained in the note unreadable to the user, denying the user of the benefit of a “system and method of linking notes to data objects” as taught by Rivette.

Therefore, no motivation exists to combine the three references in the fashion suggested by the Examiner. For at least these reasons, Applicants respectfully submit that independent claims 16, 24, and 26 are allowable over the art of record. Further, all other pending claims 17-23, 25, and 27-34 depend from one of these independent claims and are also allowable over the art of record for at least these reasons. Applicants respectfully request a Notice that this effect.

Conclusion

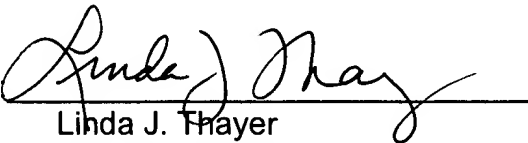
In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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